

Message

From: Formanek, Erin [formanekek@cdmsmith.com]
Sent: 4/10/2018 1:58:26 PM
To: tom.biksey@ehs-support.com
CC: Drew Baris (abaris@rouxinc.com) [abaris@rouxinc.com]; Gunnar Emilsson [EmilssonGR@cdmsmith.com]; Cirian, Mike [Cirian.Mike@epa.gov]
Subject: RE: Columbia Falls Aluminum Company Draft Baseline Human Health Risk Assessment Work Plan

Tom,

The reference was for IRIS, but I may seek to provide a revised recommendation. Upon further review for another site I am working on, investigation into the IRIS information revealed that the ratio of 6:1 is based on workplace air, not soil in the natural environment. I am actively working to get revised language and a revised ratio drafted the other site and it would be appropriate to adopt it for CFAC when it is available. Perhaps, for the time being, the workplan could include text that speaks to this in a generic sense (e.g., "consideration of the proportion of trivalent to hexavalent chromium will be taken into account in the risk assessment per recommendation from EPA") and I can provide the ratio and text in time for the risk assessment. Let me know if you want to discuss this further or if this approach will suffice for now.

Thank you,
Erin

From: Tom Biksey <Tom.Biksey@ehs-support.com>
Sent: Monday, April 09, 2018 7:23 AM
To: Formanek, Erin <formanekek@cdmsmith.com>
Cc: Drew Baris (abaris@rouxinc.com) <abaris@rouxinc.com>
Subject: Columbia Falls Aluminum Company Draft Baseline Human Health Risk Assessment Work Plan

Erin,

For comment 33; "Chromium exists in the environment mainly as Cr(III) (ATSDR 2000). However, because the valence state of chromium in soil or water at this Site is not known and data are available only for total chromium, risk calculations should assume the ratio of Cr(III) to Cr(VI) is 6:1 (EPA 2013).".

Please provide the EPA 2013 reference. I found reference to ratio in the IRIS Summary, but could not locate the EPA reference.

Smooth seas and fair winds,

Tom

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Consider it done!

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